

Follow-up Discussion on Safety Culture

ROP Public Meeting

May 18, 2023



Purpose

- Discuss comments on the NRC Safety Culture Program Effectiveness Review Report¹

¹ NRC Memorandum - “Results of the Safety Culture Program Effectiveness Review”, March 20, 2023, ADAMS Accession No. ML22340A452.

Overview

- As discussed at the April ROP public meeting, we are concerned with the basis and potential impact of the recommendations
- A letter from NEI was provided to the NRC Director, Division of Reactor Oversight on May 9, 2023, providing detailed comments

Comments

- There is no acknowledgement in the report of the many means used by the industry to foster and maintain a healthy nuclear safety culture

For example,

- Safety culture assessments
 - Performance trending
 - Corrective action program (CAP) reviews
 - Root cause evaluations
 - Senior leadership reviews
 - Independent external oversight
- Institute of Nuclear Power Operations (INPO) plays a key role in driving performance excellence including examining nuclear safety culture through peer reviews and performance continuum activities

Comments

- Recommendations 1 and 3 represent significant impactful changes in safety culture inspection and oversight

Recommendation 1

- Inconsistent with graduated regulatory oversight via the supplemental inspection program imposing Column 3 response on Column 2 plants
- Implies that changes made from SECY-15-0108 did not consider impact on safety culture oversight
- Introduces additional subjectivity & unpredictability to the ROP

Recommendation 3

- Inconsistent with graduated regulatory oversight by significantly expanding NRC inspection and assessment of safety culture for Column 1 plants
- Contrary to the acknowledgement in the report of cross-cutting issue program effectiveness to identify potential safety culture weaknesses
- Inconsistent with SECY-04-0111 that recognized the subjective nature of safety culture direct inspection that may detract from the goals of an objective, risk informed, and predictable ROP

Other Recommendations

Recommendation 2

Improve training available to inspectors to better meet Commission objectives stated in SRM-SECY-04-0111

- Enhanced or additional training, if applied using a systematic approach, is an effective tool to increase knowledge and skills and to help maintain proficiency and should be considered if knowledge gaps exist or there is a recognized benefit to help inspectors meet NRC objectives

Other Recommendations

Alternative Recommendation

Revise existing assessment guidance to prompt NRC management discussions to encourage licensee action to address safety culture aspects before significant performance degradation occurs

- Appears to be more aligned with a graded approach to oversight and the principles of good regulation but was only briefly described in the report limiting our feedback

Summary

- We are concerned with the basis and potential impact of the recommendations from the NRC report
- Recommendations 1 & 3 represent significant impactful changes to safety culture inspection and oversight that are unwarranted
- More detailed comments can be found in the NEI letter